

of potential jurors. *See* FED. R. CRIM. P. 24. Permitting this questionnaire and individual voir dire will create “a reasonable assurance that prejudice will be discovered if present.” *United States v. Flores*, 63 F.3d 1342, 1353 (5th Cir. 1995).

4. On October 15, 2014, counsel for the Government wrote to each of the defense counsel, informing them of the Government’s intention to seek a jury questionnaire, providing them a copy of the proposed questionnaire, and soliciting any suggestions or changes. No substantive response was received.

5. A proposed questionnaire is attached as exhibit A.

6. The Government requests a return date for the questionnaire of January 5, 2014, and further requests that the court direct the questionnaires be provided to all counsel 10 days prior to trial.

WHEREFORE, the United States respectfully requests the Court approve the use of a jury questionnaire and to permit the parties to conduct individual voir dire.

Respectfully submitted,

GREGORY K. DAVIS
United States Attorney

By: /s/ Glenda R. Haynes
Glenda R. Haynes
Assistant United States Attorney
MS Bar #: 2132

VANITA GUPTA
Acting Assistant Attorney General
Civil Rights Division

By: /s Sheldon L. Beer
Sheldon L. Beer
Trial Attorney
MA Bar # 661165

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 19, 2014, I electronically filed a copy of the foregoing Government's Motion for Jury Questionnaire and Individual Voir Dire with the Clerk of the Court using the Electronic Case Filing system (ECF), which served to send notification of this filing to all counsels of record.

This 19th day of November, 2014.

/s Glenda R. Haynes
Glenda R. Haynes
Assistant United States Attorney

/s Sheldon L. Beer
Sheldon L. Beer
Trial Attorney